CDM

Memorandum

To: *Mike Cirian, P.E., EPA RPM*

From: *Dominic Pisciotta, Environmental Resource Specialist Lead*

Date: *September 17, 2010*

DCN: *Work Assignment No.: 229-RICO-08BC, Libby Asbestos Superfund Project, OU4 Remedial Investigation/Feasibility Study*

Subject: *2009-2010 CDM Libby, Environmental Resource Specialist Summary Report for Libby Asbestos Site, Libby, Montana*

Program Objective

The objective of the Environmental Resource Specialist (ERS) program is to provide Libby area property owners with means to mitigate potential exposure to Libby amphibole asbestos (LA) or LA source materials, such as Libby vermiculite, during routine and non-routine activities at Libby area properties. These activities may consist of, but are not limited to: building repair, remodeling, maintenance, utility servicing, installation, and construction.

Specifically, the ERS program provides property owners/residents with information related to Libby vermiculite and guidance on safely working with material potentially containing LA or LA source materials. ERS personnel may conduct onsite evaluations of reported situations, providing recommendations, if necessary, of methods to safely continue the intended work activities. ERS personnel perform an initial assessment in order to evaluate the level of response needed which could range from information only, emergency, interior (non-emergency designed response), or an exterior (non-emergency designed response).

Document Purpose

The purpose of this report is to review and evaluate the effectiveness of the ERS program from the beginning of the work assignment on July 11, 2009 to July 3, 2010. This report includes:

- Summary of the ERS activities
- Statistics for ERS activities
- CDM level of effort and total cost associated with ERS activities
- Evaluation of overall effectiveness and efficiency of the program, and recommendations to improve the program

Quality Assurance

The U.S. Environmental Protection Agency (EPA) has established a formal Quality Assurance (QA) program to ensure that a high level of quality is maintained throughout all stages of work on the Libby Asbestos Project. The QA program includes, but is not limited to: independent review of deliverables; conducting assessments and audits; and ensuring quality issues are promptly addressed and documented. CDM Federal Programs Corporation (CDM) maintains QA oversight of their work for the duration of the work assignment. All work under the ERS program is conducted in accordance with the quality procedures described in the EPA Region 8 Response Action Contract 2 Quality Management Plan (CDM 2005) and CDM Quality Assurance Manual (CDM 2007).

Details regarding quality assurance/quality control (QA/QC) mechanisms (e.g., quality control checks, quality control samples) for sample and analytical data are included in the General Property Investigation (GPI) Sampling and Analysis Plan (SAP) (CDM 2010a) or Response SAP Revision 1 (CDM 2008), as applicable to the specific ERS sampling activity that may be performed.

Summary of ERS Activities

The following section includes a summary of the ERS activities which were completed by CDM personnel from July 11, 2009 to July 3, 2010.

Notification of ERS inquiries typically began with the receipt of a call to the Libby area ERS-designated phone line, the Libby EPA Information Center, or Montana Department of Environmental Quality (MT DEQ) Troy Information Office. A determination was made by the responder, in consultation with the ERS or ERS support staff, as to whether the inquiry merited ERS investigation, and was therefore an actual ERS request.

Valid ERS inquiries received directly at the EPA Information Center or MT DEQ Information Office were documented in the ERS tracking system by ERS administrative support personnel. This ERS tracking system entry was then forwarded to the ERS Lead in order to begin an initial assessment. Valid ERS inquiries received on the ERS phone line were documented by the responder and sent to ERS administrative support personnel by email for entry to the ERS tracking system.

Following notification, the ERS Lead typically performed a site visit in order to evaluate the situation and determine an appropriate response type. Personnel performing initial assessments documented their activities in accordance with ERS-specific procedures as stated in the Libby Asbestos Project Environmental Resource Specialist Plan (CDM 2009) and any other documents governing the work conducted for the specific response type.

Throughout this reporting period, ERS personnel performed initial assessments in order to evaluate the level of response needed which ranged from information only, emergency, interior (non-emergency designed response), to exterior (non-emergency designed response). If a removal contractor was needed to perform any work after an initial response, ERS personnel would develop a statement of work (SOW) which would then be forwarded to the government

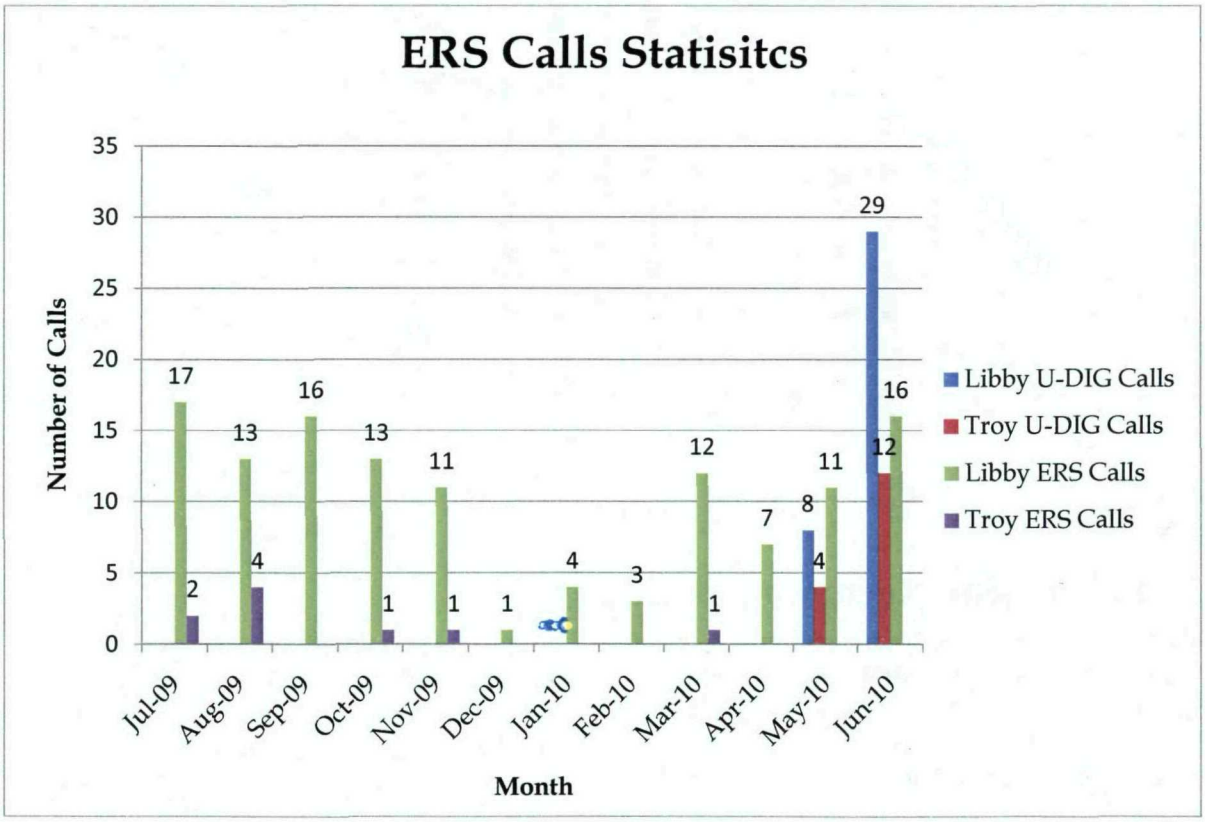
contracting officer responsible for directing the removal contractor. ERS personnel would then track properties through completion of the response work and, in coordination with ERS administrative support personnel, would update the property folder according to project procedures and specifications.

ERS Statistics

Table 1. Total ERS Calls Received During Work Assignment Reporting Period	
ERS Calls/Libby	130
ERS Calls/Troy	9

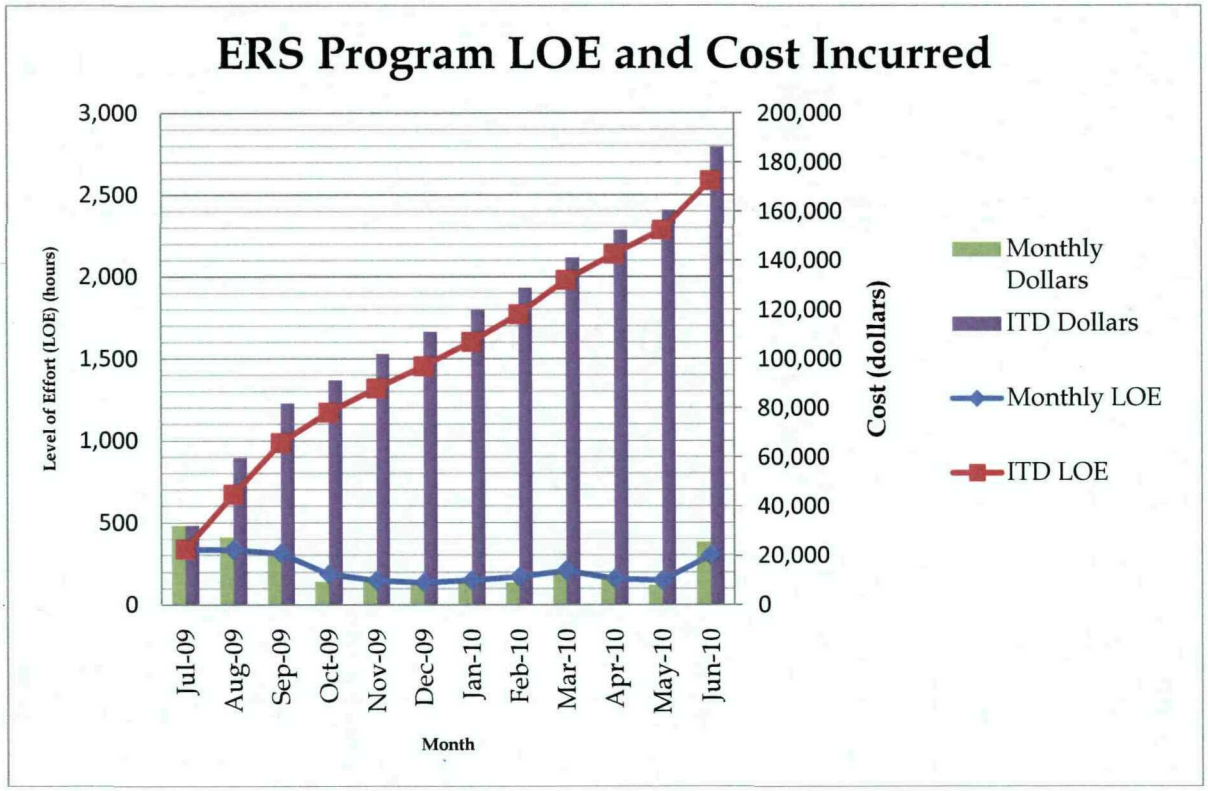
Table 2. Total U-DIG Calls Received During Work Assignment Reporting Period	
U-DIG Calls/Libby (Program Began on 5/20/10)	40
U-DIG Calls/Troy (Program Began on 5/20/10)	16
U-DIG Calls/PRI – Removal Sites (Program Began on 5/20/10)	48

Table 3. Total Statements of Work Submitted During Work Assignment Reporting Period	
SOWs Submitted	36



Level of Effort and Total Cost

The overall cost incurred by CDM to support the ERS program (including equipment, supplies, and other direct costs) between July 2009 and June 2010 was $186,270, with an average monthly cost of $15,520. The total labor hours incurred by CDM to support the ERS program between July 2009 and June 2010 was 2,588 professional labor hours, with an average of 215 hours incurred each month. During the construction season, 1.5 full-time equivalent employees provided support to the ERS program and costs during these months increased, as shown in the following graphic.



Evaluation and Recommendations

The overall reception from the community on the ERS program has appeared to be positive due to responses during site visits and inspections. The number of calls to the EPA Information Center and/or the ERS-designated phone line increased dramatically from 2008 to 2009, with 70 ERS calls in 2008 and 184 calls in 2009. The increased awareness of the ERS program has allowed EPA and its contractors to help protect remedies at former remediation sites, increase public awareness regarding hazards associated with LA source materials, and protect the overall public health of the community. The following sections outline successes of the program

during the reporting period as well as recommendations to continue to improve the overall program.

CDM revised the Environmental Resource Specialist Plan, Libby Asbestos Project (CDM 2010b) to better align the technical approach with the new removal mechanism in place. In addition, a pamphlet was developed by CDM that outlines best management practices for homeowners wishing to demolish buildings on their property. Once the brochure is approved for circulation, it should prove to be a very valuable tool in assisting home and business owners with increased knowledge of what steps are necessary when demolishing a building.

CDM began working with MT DEQ and its subcontractor, Tetra Tech, to train and transition Operable Unit 7 (Troy) ERS requests, responses, and SOW to Tetra Tech for Troy, Montana. This transition showed the teamwork that exists between agencies and contractors on the Libby Project.

With the inception of EPA being involved with the Montana One Call system and U-DIG beginning on May 20, 2010, the level of effort needed to handle the influx of calls was drastically increased. By the beginning of July 2010, the number of U-DIG calls to the ERS hotline system nearly doubled the amount of normal ERS calls. With the increase of calls and inception of U-DIG during the heightened busy construction season, an increase of two full-time equivalent employees is recommended to support the ERS program in meeting the 24-hour response time currently in place for all ERS calls.

New and improved process changes have occurred whereby the ERS lead is provided input from the removal contractor's foreman during the development of the SOW. The increased communication between the ERS lead and the removal contractor's foreman has shown to be valuable and has decreased the approach changes that sometimes occur during implementation of the response.

To continue improving the ERS program, CDM recommends the following changes and additions:

Streamline Documentation Process

A more streamlined process should be developed with regard to receiving final documentation and property information from the removal contractor so that up to date information is available for properties which have received a removal recently. As the process stands right now, hard copy information is given to CDM to be housed and filed at the end of the construction season.

Increased Program Advertisement

It is recommended that the increased advertisement of the ERS program continue due to the great reception it has received from the community and the overall increased knowledge of the public regarding vermiculite-containing materials and LA. Introducing a survey to get specific feedback and see what changes the community recommends would assist EPA contractors in evaluating the current program. A revised orientation primer should be developed that focuses

on excavation activities and can be given to those companies who are from out of town or have never encountered vermiculite prior to their work in Libby. In addition, attendance at local health fairs by EPA representatives should be discussed in order to increase public awareness.

Improved Coordination with City and County Officials

The Libby Project has worked with the City of Libby to become more involved with protecting remedies and has assisted when vermiculite or possible LA source material has been encountered at their excavation sites. A recommendation is to facilitate the capabilities of the city to be able to haul vermiculite-containing soil to the Former W.R. Grace Mine site.

References

CDM. 2005. EPA Region 8 Response Action Contract 2 Quality Management Plan. July 7.

_____. 2007. Quality Assurance Manual, Revision 11. March.

_____. 2008. Response Action Sampling and Analysis Plan, Revision 1, Libby, Montana. April.

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_____. 2010a. Sampling and Analysis Plan, General Property Investigation, Operable Unit 4, Libby Asbestos Superfund Site, Libby, Montana. April.

_____. 2010b. Environmental Resource Specialist Plan, Libby Asbestos Site, July.